

DECLARATION OF DAVID HECKER

My name is David Hecker. I make this declaration under penalties of perjury.

1. I am President of AFT Michigan. In September, 2017, I became aware that AFT MI had been infiltrated by a person who was engaged by AFT MI to serve as a Summer Intern.
2. The person had identified herself as Marisa Perez and said that she was interested in teaching in the public schools and wanted to learn about labor organizations representing teachers.
3. However, I learned that Perez was in fact Marissa Jorge, an employee of Defendant Project Veritas.
4. Immediately after becoming aware of the infiltration, I contacted David Strom, General Counsel to the American Federation of Teachers. I have previously sought legal advice from Mr. Strom and his staff on other matters.
5. I sought legal advice from Mr. Strom and Jessica Rutter, the attorney from his office that he assigned to this matter, regarding how to respond to the infiltration.
6. I also instructed AFT MI staff to communicate with Ms. Rutter with respect to the Jorge infiltration.
7. I understood and intended the communications between myself and AFT MI staff and Mr. Strom and Ms. Rutter to be confidential and be as part of a professional legal relationship between AFT MI and attorneys it consulted.

Signed under penalty of perjury
May 15, 2020

/s/ David Hecker
DAVID HECKER